

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                          |   |                            |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA | ) |                            |
|                          | ) | Magistrate No. 3:23-115 MJ |
| v.                       | ) |                            |
|                          | ) | [UNDER SEAL]               |
| CRAIG ZAHRADNIK          | ) |                            |

**MOTION TO UNSEAL THE CRIMINAL COMPLAINT AND LIMITED UNSEALING  
OF THE AFFIDAVIT IN SUPPORT OF THE CRIMINAL COMPLAINT**

AND NOW comes the United States of America, by its attorneys, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Maureen Sheehan-Balchon, Assistant United States Attorney for said District, and respectfully submits the following:

1. On April 26, 2023, the Honorable Keith A. Pesto, United States Magistrate Judge, signed a federal criminal complaint, charging the Defendant with Engaging in the business of Dealing and Manufacturing Firearms Without a License, in violation of 18 U.S.C. § 922(a)(1)(A); and Conspiracy to Deal and Manufacture Firearms Without a License, in violation of 18 U.S.C. § 371.

2. The Criminal Complaint is based upon the facts set forth in an Affidavit.

3. The Court signed an Order sealing the Criminal Complaint, Affidavit, and Arrest Warrant together with the Motion to Seal and Order granting the same, until further order of Court.

4. The Defendant was arrested on April 27, 2023.

5. Ordinarily, the government would move to unseal the Criminal Complaint and Affidavit; however, in this case, the Affidavit provides details as to the nature of the offense conduct, to include actions of potential government witnesses, confidential informants, and an undercover agent. While the names of the potential government witnesses, confidential informants, and undercover agents are not contained therein, it could be readily ascertained who these

individuals are, which would expose the individuals to the possibility of retaliation and/or intimidation.

6. The United States requests, that in the interest of justice, the court authorize the unsealing of the Criminal Complaint, identifying the charges against the Defendant but only authorize a limited unsealing of the Affidavit to the Criminal Complaint so that government is able to provide a copy of the Affidavit to the Defendant and to the United States Probation Office.

7. The United States further requests that all other matters remain under seal and any further disclosure is prohibited until further order of the Court.

A proposed Order is attached.

Respectfully submitted,

TROY RIVETTI  
Acting United States Attorney

By: /s/ Maureen Sheehan-Balchon  
MAUREEN SHEEHAN-BALCHON  
Assistant United States Attorney  
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